

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

INTERNATIONAL BUSINESS MACHINES CORPORATION,)	
)	
)	
Plaintiff,)	C.A. No. 16-122-LPS
)	
v.)	JURY TRIAL DEMANDED
)	
GROUPON, INC.)	
)	
Defendant.)	

IBM'S NOTICE OF 30(B)(1) DEPOSITION OF JIM BREEN

Please take notice that, pursuant to Federal Rules of Civil Procedure 30(b)(1), Plaintiff International Business Machines Corporation ("IBM"), by its counsel, will take the deposition upon oral examination of Jim Breen. The deposition will begin on August 3, 2017, at 9:30 a.m., at the offices of Desmarais LLP, 230 Park Avenue, New York, NY 10169, or at such time and place as the parties may agree.

The deposition will be before a Notary Public or other officer authorized by law to administer oaths and will be recorded using videographic, audiographic, and/or stenographic means, or a combination of those means.

POTTER ANDERSON & CORROON LLP

OF COUNSEL:

John M. Desmarais
Karim Oussayef
Laurie N. Stempler
Robert C. Harrits
Brian D. Matty
Michael Matulewicz-Crowley
DESMARAIS LLP
230 Park Avenue
New York, NY 10169
Tel: (212) 351-3400

By: /s/ Bindu A. Palapura
David E. Moore (#3983)
Bindu A. Palapura (#5370)
Stephanie E. O'Byrne (#4446)
Hercules Plaza, 6th Floor
1313 N. Market Street
Wilmington, DE 19801
Tel: (302) 984-6000
dmoore@potteranderson.com
bpalapura@potteranderson.com
sobyrne@potteranderson.com

Dated: July 13, 2017
5307703 / 43155

*Attorneys for Plaintiff International Business
Machines Corporation*